

REMARKS

Claims 39-47 are added herein. Claims 1-47 now remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Claims 1-4 over Shultz in view of Takahashi

In the Office Action, claims 1-4 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,453,339 to Shultz et al. ("Shultz") in view of U.S. Patent No. 6,442,589 to Takahashi et al. ("Takahashi"). The Applicants respectfully traverse the rejection.

Claims 1-4 recite an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

Shultz discloses a central server 12 for presenting a data from a plurality of sources to a user at Fig. 2 and Abstract. The Office Action acknowledges that that Shultz fails to disclose a data forwarder to automatically selectively forward data to a destination device according to a second user defined criteria (See Office Action, page 3). The Office Action relies on Takahashi to allegedly make up for the deficiencies in Shultz to arrive at the claimed features. The Applicants respectfully disagree.

Takahashi is relied on to disclose selectively forwarding information to a plurality of different receiving device types depending on first and second predetermined criteria at Abstract and Figs. 2-14 (See Office Action, page 3).

Takahashi discloses a system and method for selectively forwarding information to a plurality of different receiving devices (Abstract; Fig. 2). Takahashi fails to disclose or suggest the use of threads, much less an individualized network information delivery system that implements user objects as individual threads, as recited by claims 1-4.

Thus, even if it were obvious to modified Shultz with the disclosure of Takahashi (which it is not), the theoretical result would still fails to disclose or **suggest** an individualized network information delivery system that implements user objects as individual threads, as recited by claims 1-4.

Accordingly, for at least all the above reasons, claims 1-4 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 5, 10 and 14 over Schultz in view of Takahashi and IBM

In the Office Action, claims 5, 10 and 14 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, and further in view of *A Process for Customized Information Delivery*, IBM ("IBM"). The Applicants respectfully traverse the rejection.

Claims 5, 10 and 14 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 5, 10 and 14 recite an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi fails to disclose or **suggest** an individualized network information delivery system that implements user objects as individual threads, as recited by claims 5, 10 and 14.

IBM is relied on to disclose a home PC gathering material from the web and translating the material into an audio format for replay in a car (Office Action, page 6). IBM fails to disclose anything related to an individualized network information delivery system. Therefore, even if it were obvious to modified Shultz in view of Takahashi and further in view of IBM (which it is not), the theoretical result would still fails to disclose or **suggest** an individualized network information delivery system that implements a decentralized approach in which serviced user objects are executed as individual threads, as recited by claims 5, 10 and 14.

Thus, even if it were obvious to modified Shultz with the disclosure of Takahashi and IBM(which it is not), the theoretical result would still fail to disclose or **suggest** the use of threads, much less an individualized network information delivery system that implements user objects as individual threads, as recited by claims 5, 10 and 14.

Accordingly, for at least all the above reasons, claims 5, 10 and 14 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 6-9, 15, 19 and 21 over Schultz in view of Takahashi and Herz

In the Office Action, claims 6-9, 15, 19 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of U.S. Patent No. 6,029,195 to Herz ("Herz"). The Applicants respectfully traverse the rejection.

Claims 6-9, 15, 19 and 21 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 6-9, 15, 19 and 21 recite an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi fails to disclose or **suggest** an individualized network information delivery system that implements user objects as individual threads, as recited by claims 6-9, 15, 19 and 21.

Herz is relied on to disclose a query engine adapted to query a database for content (Office Action, page 7). Depending on a user's interest levels for various topics, the system generates a user-customized rank ordered listing of target objects most likely to be of interest to each user (Herz, col. 35, lines 56-64). Users' target profile interest summaries can be used to efficiently organize the distribution of information in a large scale system and network (Herz, col. 34, lines 33-45). Herz directly interconnects clients and servers (Figs. 1 and 2).

Thus, Herz discloses a system for and method of allowing a user to define criteria that is used to selectively retrieve content from a data source. However, Herz's system and method relies on a direct connection of clients and servers **NOT** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claims 6-9, 15, 19 and 21.

Thus, even if it were obvious to modified Shultz with the disclosure of Takahashi and Herz(which it is not), the theoretical result would still fail to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claims 6-9, 15, 19 and 21.

Accordingly, for at least all the above reasons, claims 6-9, 15, 19 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 11, 12 and 16 over Schultz in view of XML

In the Office Action, claims 11, 12 and 16 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of the definition of XML in The American Heritage Dictionary, Fourth Edition ("XML"). The Applicants respectfully traverse the rejection.

Claims 11, 12 and 16 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 11, 12 and 16 recite an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi fails to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 11, 12 and 16.

The Examiner relies on XML as a metalanguage written in SGML that allows one to design a markup language that facilitates the exchange of data (Office Action, page 11). Thus, nothing within the definition of and/or the use of XML discloses or suggests an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 11, 12 and 16.

Thus, even if it were obvious to modified Shultz with the disclosure of Takahashi and XML(which it is not), the theoretical result would still fail to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claims 11, 12 and 16.

Accordingly, for at least all the above reasons, claims 11, 12 and 16 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 13 over Shultz in view of Takahashi, XML and McConnell

In the Office Action, claim 13 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, XML and further in view of An Experimental 4-Mb Flash EEPROM with Sector Erase to McConnell ("McConnell"). The Applicants respectfully traverse the rejection.

Claim 13 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 13 recites an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi and XML fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 13.

McConnell is relied on to disclose memory that may be programmed 1 byte at a time and an experimental EEPROM flashing process on 4-Mbs density flash memories (Office Action, page 12). Thus, McConnell fails to disclose or **suggest** any details related to the retrieval and forwarding of information from a data source, much less an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 13.

Thus, Shultz modified by Takahashi, XML and McConnell would still fail to disclose, teach or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 13.

Accordingly, for at least all the above reasons, claim 13 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 17 over Schultz in view of Takahashi, Herz and Kantor

In the Office Action, claim 17 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi and Herz, and further in view of Request for Comments:977, Network Working Group to Kantor ("Kantor"). The Applicants respectfully traverse the rejection.

Claim 17 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 17 recites an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz modified by the disclosure of Takahashi and Herz fails to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a

destination device, much less that implements user objects as individual threads, as recited by claim 17.

Kantor is relied on to disclose a Network News Transfer Protocol ("NNTP") to communicate with a news server to transfer articles between servers (Office Action, page 14). Thus, Schultz modified by the disclosure of Takahashi, Herz and Kantor would as best, even if they were obvious to combine (which they are not), use NNTP for the selectively retrieve data from at least one data source according to a user defined criteria, **NOT** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 17.

Thus, Shultz modified by the disclosure of Takahashi, Herz and Kantor would still fail to disclose, teach or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 17.

Accordingly, for at least all the above reasons, claim 17 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 18 over Schultz in view of Takahashi and Small

In the Office Action, claim 18 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, and further in view of Request for Comments:2739, Network Working Group to Small ("Small"). The Applicants respectfully traverse the rejection.

Claim 18 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 18 recites an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz modified by the disclosure of Takahashi fails to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 18.

Small is relied on to disclose additional data sources (Office Action, page 14). Thus, Schultz modified by Takahashi and the disclosure of Small, even with the ability to search additional data sources, fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 18.

Accordingly, for at least all the above reasons, claim 18 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 20 over Schultz in view of Takahashi and Macera

In the Office Action, claim 20 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, and further in view of U.S. Patent No. 6,453,339 to Macera et al. ("Macera"). The Applicants respectfully traverse the rejection.

Claim 20 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 20 recites an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz modified by the disclosure of Takahashi fails to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 20.

Macera is relied on to disclose a system and method to augment the searchable data sources (Office Action, page 15). Macera discloses a system and method of converting and routing data packets within a data network (Abstract), not disclosing or suggesting an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 20.

Therefore, even if it were obvious to modify Shultz with the disclosure of Takahashi and Macera to augment the searchable data sources (which it is not), Shultz modified by Takahashi and Macera would still fail to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 20.

Accordingly, for at least all the above reasons, claim 20 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 22 over Schultz in view of Takahashi and Reed

In the Office Action, claim 22 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, and further in view of U.S. Patent No. 6,088,717 to Reed et al. ("Reed"). The Applicants respectfully traverse the rejection.

Claim 22 recites an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claim 22.

Reed is relied on to disclose a communication system that allows a user to receive an e-mail notification from a database agent monitoring the

database when a new entry or a certain condition has been made in that database at col. 6, lines 62-66 (Office Action, page 15). Reed is further relied on to disclose that a data exchange event is initiated either manually by the consumer or automatically at col. 76, lines 8-9 (Office Action, page 15).

Reed discloses information contained in a provider database that is transferred and used in communications relationships with different consumers (col. 9, lines 2-4). The association information is used to selectively distribute information and information updates (Reed, col. 9, lines 6-8). A distribution server collects information from a provider program and a consumer program (Reed, Fig. 1).

Thus, Reed discloses selective distribution of information between a provider computer, a consumer computer and a distribution server. Reed fails to disclose or suggest an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 22.

Therefore, even if it were obvious to modify Shultz with the disclosure of Takahashi and Reed (which it is not), Shultz modified by Takahashi and Reed would still fail to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claim 22.

Accordingly, for at least all the above reasons, claim 22 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 23-25 over Schultz in view of Takahashi, Reed and von-Bultzingloewen

In the Office Action, claims 23-25 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Schultz in view of Takahashi, Reed and further in view of Active Information Delivery in A COBRA-Based Distributed

Information System to von-Bultzingloewen ("von-Bultzingloewen"). The Applicants respectfully traverse the rejection.

Claims 23-25 are dependent on claim 22, and are allowable for at least the same reasons as claim 22.

Claims 23-25 recite an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads.

As discussed above, Shultz in view of Takahashi and Reed fails to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device, much less that implements user objects as individual threads, as recited by claims 23-25.

The Office Action relies on von-Bultzingloewen to allegedly make up for the deficiencies in Schultz in view of Takahashi and Zirngibl. In particular, von-Bultzingloewen is relied on to disclose a process to monitor database value changes upon the detection of a change in three CLIPS rules, detecting a change in content, changed value and comparison of a new value to a limit value to determine if an action should proceed (Office Action, page 17). Von-Bultzingloewen relies on a single set of criteria for reviewing information for relevancy from a data source that is passed to user (page 218, second column, lines 5-28).

Thus, von-Bultzingloewen fails to disclose or suggest a the use of threads for any purpose, much less an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 23-25.

Therefore, Schultz modified by Takahashi, Reed and von-Bultzingloewen would still fail to disclose or **suggest** an individualized network information delivery system interposed between at least one data source and a destination device that implements user objects as individual threads, as recited by claims 23-25.

Accordingly, for at least all the above reasons, claims 23-25 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 26, 30 and 31 over Shultz in view of Takahashi and Zirngibl

In the Office Action, claim 26, 30 and 31 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi, and further in view of U.S. Patent No. 6,606,596 to Zirngibl et al. ("Zirngibl"). The Applicants respectfully traverse the rejection.

Claims 26, 30 and 31 recite a system and method relying on at least one of an event listener and a data worker user objects that are implemented as individual threads.

As discussed above, Shultz in view of Takahashi fails to disclose or **suggest** the use of threads for any purpose, much less a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 26, 30 and 31.

Zirngibl discloses a system and method of creating sound files for a destination device based on user criteria, e.g., a report of the result of a favorite sports team game (Fig. 3a; col. 5, lines 55-65). Thus, Zirngibl's user specifies a set of criteria for locating and downloading a desired piece of information from a source storing the sound file. Zirngibl fails to disclose or **suggest** a system and method relying on threads, much less relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 26, 30 and 31.

Thus, Shultz modified by the disclosure of Takahashi and Zirngibl fails to disclose or **suggest** a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 26, 30 and 31.

Accordingly, for at least all the above reasons, claims 26, 30 and 31 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 27 and 32 over Shultz in view of Takahashi, Zirngibl and Daswani

In the Office Action, claim 27 and 32 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi and Zirngibl, and further in view of U.S. Patent No. 6,477,565 to Daswani et al. ("Daswani"). The Applicants respectfully traverse the rejection.

Claims 27 and 32 are dependent on claims 26 and 31 respectively, and are allowable for at least the same reasons as claims 26 and 31.

Claims 27 and 32 recite a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads.

As discussed above, Shultz in view of Takahashi and Zirngibl fails to disclose or suggest a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 27 and 32.

The Office Action relies on Daswani to allegedly make up for the deficiencies in Shultz in view of Takahashi and Zirngibl to arrive at the claimed features. The Applicants respectfully disagree.

Daswani discloses a system and method for retrieving and disseminating information records from Internet sources that includes a client device and an intermediary server system (Abstract). A request for data can include a data result of a site-specific search according to defined parameters, information about departure/arrival parameters and gate instructions, a desire to access only existing incoming mail from a certain individual or individuals (Daswani, col. 7, lines 17-30).

Thus, Daswani discloses a system and method of allowing a user to selectively retrieve data from a data source according to a user defined criteria. However, Daswani fails to disclose or suggest the use of threads, much less a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 27 and 32.

Thus, even if it were obvious to modify Shultz in view of Takahashi, Zirngibl and Daswani (which it is not), the result would still fail to disclose or **suggest** a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 27 and 32.

Accordingly, for at least all the above reasons, claims 27 and 32 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 28, 29 and 33-38 over Shultz in view of Takahashi, Zirngibl and von-Bultzingloewen

In the Office Action, claims 28, 29 and 33-38 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Shultz in view of Takahashi and Zirngibl, and further in view of von-Bultzingloewen. The Applicants respectfully traverse the rejection.

Claims 28, 29, 33 and 34 are dependent on claims 26 and 31 respectively, and are allowable for at least the same reasons as claims 26 and 31.

Claims 28, 29 and 33-38 recite a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads.

As discussed above, Shultz in view of Takahashi and Zirngibl fails to disclose or **suggest** a system and method relying on user objects as individual threads, much less on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 28, 29 and 33-38.

As discussed above, von-Bultzingloewen fails to disclose or **suggest** the use of threads, much less a system and method relying on at least one of an event listener and a data worker for user objects that are implemented as individual threads as recited by claims 28, 29 and 33-38.

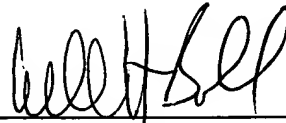
Thus, Shultz in view of Takahashi, Zirngibl and von-Bultzingloewen would still fail to disclose, teach or **suggest** a system and method relying on threads, much less on at least one of an event listener and a data worker for user objects that are implemented as individual threads, as recited by claims 28, 29 and 33-38.

Accordingly, for at least all the above reasons, claims 28, 29 and 33-38 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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